

# **EXHIBIT 25**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Master Docket No.  
17-MD-2804

This document relates to: Judge Dan Aaron  
Polster

Jennifer Artz v. Endo Health  
Solutions, Inc., et al.

Case No. 1:19-op-45459

Darren and Elena Flanagan

v. McKesson Corporation, et al.

Case No. 1:18-op-45405

Michelle Frost, et al. vs.

Endo Health Solutions, Inc., et al.

Case No. 1:18-op-46327

Walter and Virginia Salmons, et al.

vs. McKesson Corporation, et al.

Case No. 1:18-op-45268

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Videotaped deposition of  
ASHLEY POE

September 1, 2020  
10:03 a.m.

Taken at:  
Dann Law  
875 North High Street  
Columbus, Ohio

Renee L. Pellegrino, RPR, CLR

1 Poe?

2 A. Yes, he is.

3 Q. And what is Mr. Poe's date of birth?

4 A. [REDACTED].

5 Q. And what is his address?

6 A. I'm not aware of his current  
7 address by heart.

8 Q. Do you know what state he lives in?

9 A. Yes, ma'am. He lives in  
10 Washington.

11 Q. Do you and Mr. Poe have a formal  
12 custody agreement relating to [REDACTED]?

13 A. We do not.

14 Q. Do you have an informal agreement?

15 A. We do.

16 Q. And what is that?

17 A. I retain full custody of [REDACTED].

18 Q. Does Mr. Poe see [REDACTED]?

19 A. No, he does not.

20 Q. When was the last time Mr. Poe saw  
21 [REDACTED]?

22 A. 2017, when I left Washington.

23 Q. Does Mr. Poe communicate with  
24 [REDACTED]?

25 A. No, he does not.

1       destroy or throw out that journal. If you could  
2       just hang on to it and keep it in a safe place.

3             A.       Okay.

4             Q.       Do you keep a journal about your  
5       drug use?

6             A.       I do not.

7             Q.       I guess I should have said did you  
8       keep a journal about your drug use.

9             A.       No.

10            Q.       How did you become involved in this  
11       litigation? And I don't want to know any  
12       conversations that you've had with any of your  
13       lawyers.

14            A.       I was contacted after being  
15       involved with another class action case through  
16       New York, and then my lawyer contacted me  
17       asking me if I would like to represent this  
18       case.

19            Q.       What was the subject -- I'm sorry.  
20       Strike that.

21                    Were you a party to the other class  
22       action that you just referenced?

23            A.       Yes.

24            Q.       And what was the subject of that  
25       other class action lawsuit?

1 A. It was against opioid companies.

2 Q. Do you recall what court that was  
3 in?

4 A. I know it was in New York.

5 Q. Is that other class action lawsuit  
6 still ongoing?

7 A. I'm not sure.

8 Q. Are you still involved in it?

9 A. I believe so.

10 MR. DANN: Lauren, do you have a  
11 long way to go here?

12 MS. O'DONNELL: I don't, but I'm  
13 not sure if others are going to have questions.  
14 So if you want to take a quick break. I can  
15 look over my notes. I mean, I literally have  
16 half a page left, but would also like to look  
17 everything over first. So if you want to take  
18 a break and I can finish my questions and then  
19 everybody else will be ready to ask whatever  
20 they may want.

21 MR. DANN: Great.

22 Is five minutes enough time or do  
23 you need a little more?

24 MS. O'DONNELL: I'm sorry?

25 THE WITNESS: He wants to know if

1 five minutes is enough or if you need a little  
2 more.

3 MS. O'DONNELL: We might need a  
4 little bit more than five.

5 MR. DANN: Okay. Why don't we  
6 do -- I'm supposed to do a call at 2 o'clock.  
7 Can we start at like 2:05? Or -- I have to  
8 take a quick break at 2 o'clock. It's up to  
9 you, Lauren. I don't want to impose on  
10 everybody. Let me see if I can move that call.  
11 Let's come back in 15 minutes.

12 MS. O'DONNELL: Okay.

13 THE VIDEOGRAPHER: Off the record.  
14 The time is 1:41.

15 (Recess had.)

16 THE VIDEOGRAPHER: We're on the  
17 record. The time is 2:05.

18 BY MS. O'DONNELL:

19 Q. Good afternoon, Ms. Poe. Are you  
20 okay to continue?

21 A. Yes.

22 Q. You had mentioned a class action in  
23 New York. What's the name of your attorney in  
24 this case?

25 A. So I would like to clarify

1 something, actually. All of this is connected.  
2 I saw an ad for the class action in New York  
3 and I filled that out, and -- with them, they  
4 got me in contact with the people that got me  
5 to be the representative of this case. So it's  
6 all in one.

7 Q. Understood.

8 Do you have any knowledge about the  
9 distributors of the opioids that you used in  
10 your past?

11 A. I have personal experience,  
12 knowledge of the distributors, meaning back in  
13 2009, 2010 a lot of people in my neighborhood  
14 were going down to Florida to get prescription  
15 narcotics, large quantities of prescription  
16 narcotics from doctors. They would pay cash to  
17 get these medicines. They would go to the back  
18 of a semi truck to get an MRI done. They would  
19 write them prescriptions for 240 perc 30s, 240  
20 OxyContin. Then they would turn around and, on  
21 the way back to Ohio, they would stop in West  
22 Virginia, Virginia, Georgia, at Walgreens,  
23 Rite-Aid, Giant Eagle, and get those filled out  
24 of state, and then they would bring those back.  
25 And I know that there isn't a neighbor or a

1 classes of medication, and opioids were a  
2 controlled substance.

3 Q. Do you recall learning whether  
4 opioids are addictive?

5 A. Yes, I do remember.

6 Q. That was something that you were  
7 taught?

8 A. Yes.

9 Q. What relief are you seeking by  
10 filing this lawsuit?

11 A. I am seeking information and  
12 answers on just what exactly is going on with  
13 my son and what caused it.

14 Q. Are you claiming that any of the  
15 Defendants in this case are responsible for  
16 paying [REDACTED] past medical expenses?

17 A. No.

18 Q. Are you claiming that the Defendants  
19 in this case are responsible for paying any  
20 other expenses that you believe you've incurred  
21 as a result of [REDACTED] neonatal abstinence  
22 syndrome?

23 A. No.

24 Q. When [REDACTED] was born, did any  
25 healthcare providers tell you that [REDACTED] had